

FILED ENTERED	RECEIVED SERVED ON COUNSEL/PARTIES OF RECORD
NOV - 7 2018	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

1 Jesse A. Ross #1095756
 2 Hosp P.O. Box 650
 3 Indian Springs
 4 NV 89070

6 UNITED STATES DISTRICT COURT
 7 DISTRICT OF NEVADA

8 Jesse Aaron Ross,
 9 Plaintiff,

10 -VS-

11 BRIAN Sandovar et al.,
 12 Defendants.

CASE NO:

2:17-CV-02386-APG-GWF

Oral Argument Requested ★

Motion For Costs & Fees

(Fed. R. Civ. P. Rule 54(d)(1))

Associated with: [ECF No: 48],

Plaintiff's Motion For Preliminary

Injunction NO: 2

18 Comes now a bare named plaintiff; appearing Pro-se,
 19 Incarcerated; To respectfully request the court Award (consistent
 20 with Fed. R. Civ. P. Rule 54 (A)), Plaintiff reasonable costs,
 21 and Fees. This Motion is based upon the papers and
 22 Pleadings on File, The Attached memorandum of Points
 23 & Authorities, As well As any oral Argument
 24 permitted @ the hearing OF this matter.

26 ★ Per usdc .D. Nev Local Rules LR II 78-1 [civil]

28 Certificate of service Attached.

1 MEMORANDUM OF POINTS & AUTHORITIES.

2

3 I. Summary of the Argument

4

5 Plaintiff respectfully requests this court
 6 Award plaintiff reasonable expenses associate
 7 with the preparation, filing of [ECF No: 48]
 8 Plaintiff motion for preliminary Injunction No: 2
 9 (hereinafter "ECF No: 48"), consistent with
 10 Applicable Rules, statutes and 9th Cir Jurisprudence
 11 Listed herein.

12

13 II. Pertinent Procedural history

14 (A) On 12-18-17 Plaintiff filed A ^{second} Amended [Civil]
 15 complaint ("FAC"), ECF No: 19

16 (B) On 08-10-18 Plaintiff filed A motion for A preliminary
 17 Injunction No: [ECF No: 48], A Appendix Brief [ECF No: 49]

18 (C) On 08-30-18, Plaintiff filed A supplemental
 19 Appendix Brief [ECF No: 56]

20 (D) On 09-06-18 The Defendants filed an opposition
 21 to Plaintiff's motion for preliminary Injunction No: 2,
 22 [ECF No: 54]; Along with A 120 page Appendix 2

23 (E) On 09-14-18 Plaintiff filed A reply to; the defendants
 24 opposition to; Plaintiff's motion for preliminary
 25 Injunction No: 2

26 (F) On 10-15-18 The court conducted 1915 screening
 27 of the Second Amended [Civil] complaint [ECF No: 19];
 28 stayed the Action pending possible mediation resolution, For

1 90 days -

2 (G) ON 10-19-18, even though the Action was stayed
3 per the 10-15-18 § 1915 order, The Court granted
4 in part plaintiff's motion for preliminary injunction
5 No: 2 (Herein After Referred to AS ECF No: 48)
6 (H) Plaintiff timely Filed A "Bill of Costs" with
7 the court cler.

9 III Table of Authorities

Page First cited:

10	(1) Warsoldier-v-woodford 418 F.3d 989	
11	(9 th cir 2005)	4
12	(2) Crawford Fitting Co -v- J.T. Gibbons	
13	Inc 482 U.S. 437 [1987]	4
14	(3) McGill-v- Faulkner 18 F.3d 456 [7 th Cir 1994]	5
15	(4) Sanders-v- Sembold 188 F.3d 509 [6 th Cir 1999]	5
16	(5) Burt v- Hennessey 929 F.2d 457 [9 th Cir 1991]	6
17	(6) Jesmosen-v- Smith 733 F.supp 13 [W.D.N.Y 1990]	6
18	(7) Howard-v- Connett 2017 U.S. Dist Lex 517213	
19	D.NEV. 10-17-17	7
20	(8) Coleman-v- Turner 838 F.2d 1004 [8 th Cir 1988]	7
21	(9) Haddix-v- Johnson 322 F.3d 895 [6 th Cir 2003]	7
22	(10) Fed R. Civ. P. Rule 54	4
23	(11) Fed. R. Civ. P. Rule 65	4
24	(12) 28 USC § 1292(a)(1)	4
25	(13) 28 USC § 1920	4
26	(14) 28 USC § 1915(F)(3)(A)	5
27	(15) 42 USC § 1998	6
28	(16) 28 USC § 1924	7

IV Legal Standard

The Federal rules of civil Procedure ("FRCP") provide that a prevailing party may recover costs and reasonable expenses associated with Judgements (see FRCP Rule 54). This same rule also clearly & concisely defines what a "Judgement" is, i.e.

"Judgement" as used in these rules includes a decree and any order from which an appeal lies."
FRCP Rule 54(a).

A Motion For A preliminary injunction under FRCP rule 65 is automatically Appealable upon the Courts order. title 28 usc § 1292(a)(1); see also *Warsoldier-v. Woodford* 418 F.3d 989 @ 991 9th cir 2005.

Actual costs do not include every Expenditure that a litigant makes in the course of Litigation, they are in fact limited to specific items listed in 28 usc § 1920, including ---- copies of necessary documents --- and a few other items, (~~Crawford~~ *Crawford Fitting Co -v- J.T. Gibbons Inc.* 482 U.S. 437 @ 441-42 [1987]). The District court has substantial discretion whether and to what extent to tax costs for those items. I.D.

1 A Pro-se Litigant may be awarded costs on the
 2 same basis as any other Litigant, (Coleman-v-Turner
 3 838 F.2d 1004 @ 1005 [8th Cir 1988]), And may have
 4 costs imposed against him even if he is a Pro-se -
 5 IEP - Prisoner (McGill-V-Faulkner 18 F.3d 456 @
 6 460 [7th Cir 1994]; Sanders-v-Senbold 188 F.3d
 7 509 @ 509 [6th Cir 1999]; \$17,989.90 costs; \$15,750
 8 Attorney Fees), and 28 USC § ~~(F)(2)(A)~~ 1915(F)(2)(A)

9
 10 FRCP Rule 54(d)(1):

11
 12 "unless a Federal statute, these rules or a
 13 court order provides otherwise, costs - other
 14 than Attorney Fees - should be allowed to
 15 the prevailing party. ~~But costs~~ - - - -
 16 - - - - The clerk may tax costs on 14
 17 days notice. on motion served within
 18 the next 7 days, the court may review
 19 the clerk's action.

20
 21 Attorneys Fees and related Expenses

22
 23 FRCP Rule 54(d)(2):

24
 25 "Attorney Fees.

26 (A) claim to be by motion. A claim for Attorney
 27 Fees and related non-taxable expenses must
 28 be made by motion unless the substantive

"Requires those fees to be Proved @ trial
as an element of Damages,

(B) Timing and contents of the motion. Unless
a Statute or Court provides otherwise, the
motion must:

(i) be filed no later than 14 days after the
entry of Judgment;

(ii) specify the Judgment and the statute, rule
or other grounds entitling the movant to
the Award;

(iii) state the Amount sought or provide a fair
estimate of it; and

(iv) disclose if the court so orders, the terms
of any agreement about Fee's for which
the services for which the claim is made."

Attorney's Fees statutes also permit that Pro-se
Plaintiff's may recover these expenses, even though
they are not entitled Attorneys Fee's.

A Pro-se Plaintiff may recover litigation expenses
to extent attorney could receive them under
a Award of Attorney Fee's pursuant to
42 USC § 1988. (Burt-v-Hennessey
929 F.2d 457 @ 459 [9th Cir 1991]),
~~mayberry-v-walters~~ (Jermosen-v-smith
733 F.Supp 13 @ 14 (W.D.N.Y. 1990)).

1
 2 The U.S. District Court, District of Nevada
 3 Has in fact addressed Legal Assistant/
 4 Para Legal Fee's Associated with Litigation
 5 In Howard - v - Connett 2017 U.S. Dist Lexis
 6 17 213 (D.NEV 10-17-17 - 2:11-cv-01402 -
 7 RFB-GWF) Section III, Titled motion For
 8 Attorney Fee's sub. Para "D", Judge RFB
 9 granted Legal Assistant Fee's.

10
 11 Finally to recover costs, the prevailing party
 12 files a bill of costs with the court, supported
 13 by an affidavit verifying its correctness,
 14 and that the costs were necessary for
 15 the litigation. (28 USC § 1924).

16 17 V. Legal Argument

18 A. Costs.

19 Plaintiff has submitted a itemized list
 20 of Actual cost's he expended for copy work,
 21 and postage associated with the filing
 22 and Reply of ECF NO: 48. Plaintiff
 23 requests a reasonable \$43.44. see EX.
 24 A. This request is appropriate, and consistent
 25 with equity and precedent. (Coleman - v - Turner 838
 26 F.2d 1004 @ 1005 [8th cir 1988]; Hadix - v - Johnson 322
 27 F.3d 895 @ 900 [6th cir 2003]).

1 (B) Fee's

2 (i) Judgment entitling movant to Award; and Rule-
3 Statute permitting the same-

4 (a) Judgment = ECF NO: 61 in Ross-v- Sandoval et al.,
5 USDC NO: 2:17-CV-02386-APG-GWF

6 (b) Rule = "FRCP" 54 (A) - defining "Judgment"

7 (c) Statute = 28 USC § 1292(a)(1) - defining appealability
8 of A Rule 65 motion

9 (d) Amount sought = \$ 925.00 (see EX B pg 5
10 Line 14.

11

12 Plaintiff is clearly not a Liscenced attorney,
13 However plaintiff is a honors graduate of
14 Black Stone career institute ("BCI") (www.
15 blackston.edu), Which is A Nationally Regionally
16 accredited Privately Liscenced School, which
17 cost plaintiff substantially Financially for
18 tuition and books, (see EX B pg 3 lines
19 17-28 and EX C pages 1-3). copy of transcripts.

20

21 The Ninth circuit court of appeals has
22 held pro-se Plaintiffs may recover Expenses,
23 even though they are not entitled to Actual
24 Attorney Fees, (under the current RATE of \$ 190.50
25 Howard-v-Connett @ section 3).

26

27 As such Plaintiff Respectfully seeks
28 \$ 50.00 per Hour, In Light of

1 The substantial research and writing, done longhand;
 2 It is reasonable. Especially since if plaintiff were to
 3 loose the Aero were the prevailing party, they would
 4 seek costs/fees.
 5

6 VI. Conclusion

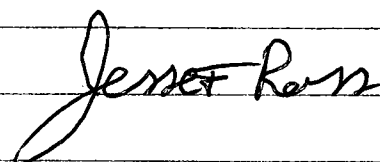
7 Plaintiff incurred substantial copywork/postage costs, In
 8 Light of plaintiff's near poverty (Plaintiff receives maybe
 9 \$140.00 a month). As such this cost is a huge sacrifice, and
 10 Plaintiff hour after long hour writing his papers longhand, and
 11 many hours researching (Plaintiff's itemized list of hours is
 12 actually very conservative).

13 A Grant or denial ~~of~~ of A preliminary Injunction is A
 14 "Judgement" (According to "FRCP" Rule 54(a)) to which a
 15 prevailing party may ^{at} the courts discretion, receive
 16 Costs and Fees.

17 Plaintiff respectfully requests this court Award:

18
 19 Paralegal/Legal Assistant Fee's 19.5 hrs @ \$50.00 = \$975.00,
 20 Actual costs, - postage/copy work \pm 43.44,
 21 Grand total = \$968.44.

22 10-26-18

23
 24 

25 Jesse Ross

26 Pro-se - Plaintiff

27

28

EXHIBIT A

Bill of Costs

EXHIBIT A

1 Jesse A. Ross #1095796
 2 HOSP - P.O. Box 650
 3 Indian Springs NV 89070
 4

5 UNITED STATES DISTRICT COURT
 6 DISTRICT OF NEVADA
 7

8 Jesse Aron Ross,
 9 Plaintiff,

CASE No:

2:17-CV-02386-APG-GWF

10 -VS-

11 Brian Sandaun et al.,
 12 Defendants

* Plaintiff's "Bill of Costs"

In relation to ECF No: 48 + 60,

Plaintiff motion for preliminary

Injunction No: 2, and order
 Granting Injunction.

13
 14
 15
 16
 17
 18 This Bill of Costs is signed under Declaration
 19 of penalty of perjury per 28 USC § 1746,
 20 NRS 208.165; NRS 53.045. see Page 3
 21

22 Total Costs Requested - \$43.44
 23

24 Fed. R. Civ. P. Rule 54(d)(1); 28 USC § 1924.

25 This Bill of Costs is directed to the costs associated with
 26 the Filing of ECF No: 48; and the Judgment (in accordance
 27 with Fed. R. Civ. P. Rule 54(a)) entered in ECF No: 61
 28 Certificate of service Attached.

1 I. Itemized List of expenses/ costs IN Re: ECF No 48

2

3 (A) Plaintiff's motion for preliminary Injunction No: 2

4 [19 pages] copied twice 38 pages = \$ 3.80; Postage

5 \$ 2.20

= \$6.00

6 (B) Plaintiff's Appendix Brief; 51 pages copied twice - 102 pages

7 @ \$ 10.20; Postage \$ 6.12

= 16.32

8 (C) Plaintiff's supplement to Plaintiff's Appendix Brief; 51 pages

9 Copied twice - 102 pages @ \$ 10.20 Postage \$ 6.12 = 16.32

10 (D) Plaintiff's Reply to; Defendants opposition to;

11 Plaintiff's motion for preliminary Injunction

12 No: 2 13 page copied twice 26 pages @ \$ 2.60,

13 Postage \$ 2.20

= \$4.80

14

15 Prison photocopies are \$ 10 each, one copy for

16 Plaintiff, one for defendant original to

17 court, each filing requires snail mail

18 postage to court + A270. These costs were necessary.

19

20 Line Item Grand total

= \$43.44

21

22

23

24

25

26

27

28

1 I understand that a False Statement or Answer
 2 will subject me to the penalties of perjury and/or
 3 sanction by this Court.

4
 5 I Jesse Aron Ross declare under penalty of perjury
 6 under the Laws of the United States of America, and,
 7 the State of Nevada; that the foregoing is true
 8 and correct to the best of my personal knowledge;
 9 except those statements based upon information
 10 and belief; and as to those I believe them to
 11 be true. 28 USC § 1746; NRS 208.165; NRS 53.045.

12
 13 signed on 10-26-18 @
 14 22010 Cold Creek Rd
 15 (Clark County)
 16 Indian Springs NV.
 17 89070

x ~~Jesse Aron Ross~~
 Declarant:
 Jesse Aron Ross
 #1095786 - HDSP
 P.O. Box 650
 Indian Springs NV. 89070

EXHIBIT B

Bill of costs & Fees

EXHIBIT B

FILED ENTERED	RECEIVED SERVED ON COUNSEL/PARTIES OF RECORD
NOV - 7 2018	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY:	DEPUTY

1 Jesse A. Ross #1095756
2 HDSR P.O. Box 650
3 Indian Springs NV. 89070
4

5 UNITED STATES DISTRICT COURT
6 DISTRICT OF NEVADA
7

8 Jesse A. Ross,
9 Plaintiff,

10 VS:

11 BRIAN SANDOVAL et al.,
12 Defendants.

CASE NO:

2:17-CV-02386-APG-GWF

* Plaintiff's "BILL OF
COSTS" and Fees - In

Relation to [ECF NO: 48];

Plaintiff's motion for

Preliminary Injunction No: 2.

17 This Bill of Costs is signed under Declaration
18 of penalty of perjury; 28 USC § 1746,
19 NRS 208.165; NRS 53.045.

20
21 Total Costs and Fees Requested (Page 3) = \$ 968.44
22

23
24

25
26

27

28 Certificate of service Attached.

1 I. Itemized List of expenses

2

3 (A) Plaintiff's motion for preliminary Injunction No: 2;

4 19 Pages copied twice \$ 3.80 (38 pages).

5 Postage \$ 2.20 = \$ 6.00

6 (B) Plaintiff's Appendix Brief; 51 pages copied twice

7 102 pages \$ 10.20; Postage \$ 6.12 = \$ 16.32

8 (C) Plaintiff's supplement to Plaintiff's Appendix Brief;

9 51 pages copied twice 102 pages \$ 10.20; Postage

10 \$ 6.12 = \$ 16.32

11 (D) Plaintiff's Reply to Defendant's opposition to;

12 Plaintiff's motion for preliminary Injunction No: 2;

13 13 pages copied twice \$ 2.60 - Postage

14 \$ 2.20 = \$ 4.80

15 Prison photocopies are \$.10 per page.

16 Total Cost For Postage and Prison copy work

17 Line Items A - D = \$ 43.44.

18

19 II. Hourly Fee Itemization

20 (A) Motion for preliminary Injunction No: 2

21 10 Hours of Actual research, writing, organizing

22 Plaintiff's Appendix Brief

23 Requested Fees of 10 hours X \$ 50.00 = \$ 500.00

24 (B) Plaintiff's supplement to Plaintiff's Appendix

25 Brief - 5 hour X \$ 50.00 = \$ 250.00

26 (C) Reading Defense opposition to Plaintiff's

27 Motion for preliminary Injunction No: 2 - .75 hr;

28 and defense Appendix Volume No: I consisting

1 of 16 Exhibits totalling 120 pages; 3.25 hours,
 2 4. hours x \$ 50.00 \pm \$ 200.00
 3 ① Plaintiff's reply to; Defense opposition to;
 4 Plaintiff's Motion for preliminary Injunction No: 2;
 5 4.0 hours of Actual Research, cross-Research,
 6 And writing. 4 hours x \$ 50.00 \pm \$ 200.00
 7

8 NOTE: Plaintiff must Long Hand All papers,
 9 an especially onerous TASK.
 10

11 Line items section II. A-D \cdot = \$ 925.00
 12

13 section I = \$ 43.44
 14 section II = \$ 925.00

15 GRAND total = \$ \$ 968.44
 16

17 Plaintiff, Based upon information, Belief and
 18 personal Knowledge Believes the Above is
 19 true & Accurate Expenditure of expenses
 20 I Jesse Ross certify That I Am a Blackstone career
 21 Institute graduate (www.blackstone.edu). ("BCI").
 22 I certify I graduated with honors (95.80% GPA) on
 23 11-07-2017 After 28 months of enrolled study. I certify
 24 that BCI is nationally Accredited by "DEAC"; regionally
 25 Accredited by "MSC" and A License private school
 26 regulated by the pennsylvania state board of private
 27 Licensed schools, and that @ my own expense Paid
 28 tuitions and books.

1 I understand that a False statement or Answer
 2 will subject me to penalties of perjury and/or
 3 sanction by this court.

4

5 I Jesse Aron Ross Declare under penalty of
 6 Perjury under the Laws of the United States
 7 of America; and the State of Nevada;
 8 That the foregoing is true and correct to the
 9 Best of my personal Knowledge; except those
 10 Statements made upon information & Belief; and
 11 As to those I Believe them to be true.

12 28 USC §1746; NRS 53.045; NRS 208.165

13

14 signed on 26 October 2018

15 @ 22010 Cold Creek Rd

16 (Clark county)

17 Indian Springs NV. 89070

18

19

20

21

22

23

24

25

26

27

28

X Jesse Aron Ross

Declarant:

Jesse Aron Ross

#1095756- HDSP

P.O. Box 650

Indian Springs

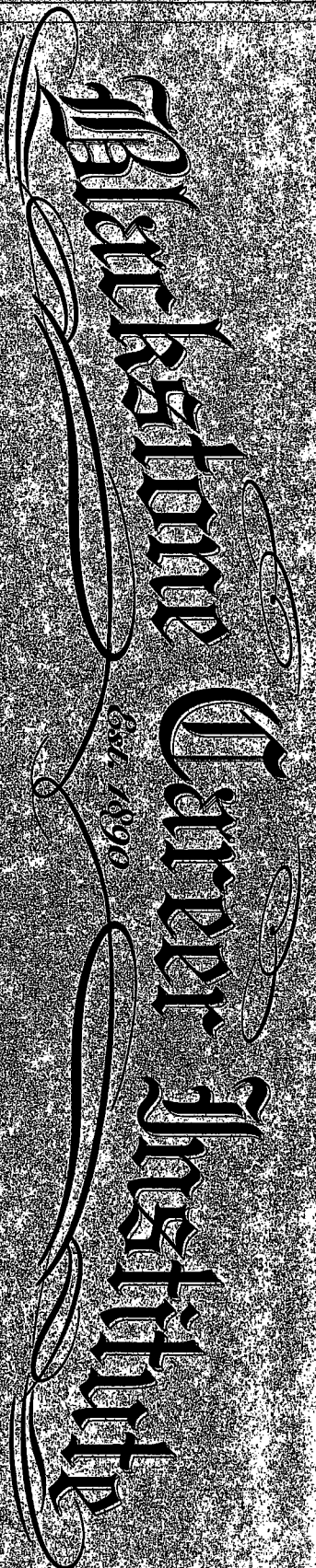
NV. 89070

EXHIBIT C

Plaintiff's Blackstone

1) certificate 2) school transcripts

EXHIBIT C



Confers this Certificate of
Legal Assistant/Paralegal
with Distinction upon

Jesse Aron Ross

who has fulfilled all the requirements prescribed by the School and is entitled
to all of the honors, rights and privileges hereunto appertaining.
In Testimony Whereof this recognition of achievement is

Given this 7th Day of November 2017



Prepared

Director of Education

William A. Schaefer, B.S., M.Ed.

BLACKSTONE CAREER INSTITUTE

1011 Brookside Road, Suite 300, P.O. Box 3717, Allentown, PA 18106-3717

Student Transcript**31 Lesson Paralegal Studies Certificate Program****915 Clock Hours**

Student: Jesse Ross 1095756
Address: PO Box 650
 Indian Springs NY 89070

Student Number: 08032292**Enrollment Date:** 07/01/2015**Completion Date:** 11/07/2017

Text/Subject	Date Completed	Grade	Text/Subject	Date Completed	Grade
Lesson: 1			Lesson: 8		
• Introduction To Law	08/18/2015	100	• Law of Private Corporations	09/22/2017	95
• Contracts Part I	08/18/2015	95	• Law of Partnerships Part I	09/22/2017	95
• Contracts Part II	08/18/2015	100	• Law of Partnerships Part II	09/22/2017	100
• Contracts Part III	08/18/2015	90	Lesson: 9		
Lesson: 2			• Constitutional Law Part I	09/25/2017	100
• Law of Torts Part I	11/06/2015	100	• Constitutional Law Part II	09/25/2017	90
• Law of Torts Part II	11/06/2015	95	Lesson: 10		
• Law of Torts Part III	11/25/2015	90	• Constitutional Law Part III	10/24/2017	95
• Law of Torts Part IV	11/25/2015	95	Lesson: 11		
Lesson: 3			• Legal Research Part I	10/24/2017	100
• Criminal Law Part I	01/05/2016	100	Lesson: 12		
• Criminal Law Part II	01/05/2016	100	• Legal Research Part II	10/30/2017	90
Lesson: 4			Lesson: 13		
• Real Property Part I	08/02/2016	100	• Employability Skills	10/30/2017	95
• Real Property Part II	08/02/2016	100	Lesson: 14		
Lesson: 5			• Ethics	11/01/2017	100
• Real Property Part III	01/16/2017	95			
• Real Property Part IV	01/16/2017	100			
Lesson: 6					
• Pleadings in Civil Action Part I	01/16/2017	90			
• Pleadings in Civil Action Part II	07/25/2017	95			
• Practice in Civil Actions	07/25/2017	90			
• Criminal Procedure	07/31/2017	85			
Lesson: 7					
• Wills Part I	09/19/2017	100			
• Wills Part II	08/07/2017	95			
• Trusts	09/19/2017	95			

Student Average: 95.80% **** FINAL ******This Document Issued:** 11/07/2017**Blackstone Career Institute**By: *Valerie A. Behrle B.S., M.Ed.*

Registrar



A Direct Learning Systems School

 Phone: 610-871-0031 • 800-826-9228 • Fax: 610-871-0034
 email: info@blackstone.edu • www.blackstone.edu

Blackstone Career Institute
1011 Brookside Rd, Suite 300
Allentown, PA 18106
610-871-0031 FAX: 610-871-0034
Blackstone.edu

HISTORY

If you search back issues of the World Book Encyclopedia you will find Blackstone listed as one of the oldest correspondence schools in the nation, founded in 1890 as the Blackstone School of Law in Chicago. In the early 1900s, the Modern American Law Series was developed for the program and was enthusiastically received by the legal community and laymen alike as a simple yet authoritative commentary on the law. In the late 1970s, Blackstone became a legal assistant/paralegal school and moved to Dallas, Texas. Additional study units on legal research, ethics, and employment skills were added so that graduating students could sit for the Certified Legal Assistant (CLA/CP) exam.

In 2001, Direct Learning Systems Inc., an online publishing company, purchased the Blackstone legal assistant/ paralegal school from the retiring owner and relocated to Pennsylvania. Shortly after, the name was changed to Blackstone Career Institute (BCI), currently offering distance education programs in a variety of career fields in addition to continuing legal education courses.

ACADEMIC CALENDAR

Offering open admission, students can enroll at any time and start their studies immediately.

ACCREDITATION

Blackstone Career Institute is an online school accredited by the Distance Education Accrediting Commission (DEAC), Washington, D.C., regionally accredited by the Middle States Commission on Secondary Schools, and is a private licensed school regulated by the Pennsylvania State Board of Private Licensed Schools.

GRADING SYSTEM

<u>Letter Grade</u>	<u>Numerical Equivalent</u>
A	94-100
B	86-93
C	78-85
D	70-77
F	Below 70

Any student who attains a final average of 94-100% at the end of their career training program will qualify as graduating "with Distinction." The certificate issued upon graduation will note this honor.

Mission Statement

"A pioneer in distance education, Blackstone Career Institute has been meeting the needs of adult learners since 1890. The school's mission is to change people's lives through education, teaching them new skills and preparing them for entry-level careers in today's high demand fields. Blackstone offers adult learners convenient and affordable training that accommodates their busy schedules while helping them successfully meet their educational goals. As a nationally and regionally accredited school, we fulfill our mission by providing high-quality, effective, technology-driven distance education programs and services."

RELEASE OF INFORMATION

In compliance with the Family Educational Rights and Privacy Act of 1974, this information is transferred at the request of the student. The recipient will not permit any other party access to the information without written consent of the student.

AUTHENTICITY: This Transcript contains an indelible Water Mark Logo. It is transparent and visible from both sides. Hold up to light to verify. Attempts to copy this document will result in the word "VOID" appearing on the copy.

PROOF OF SERVICE BY MAIL

BY PERSON IN STATE CUSTODY

(Fed. R. Civ. P. 5; 28 U.S.C. § 1746)

I, Jesse Ross, declare:

I am over 18 years of age and a party to this action. I am a resident of High Desert
STATE PRISON Prison,
in the county of CLARK County Nevada

My prison address is: P.O. Box 650 Indian
Springs NV. 89070

On 11-1-18,
(DATE)

I served the attached: Motion For Costs & Fees (Fed. R. Civ.
P. Rule 54(d)(1))
(DESCRIBE DOCUMENT)

on the parties herein by placing true and correct copies thereof, enclosed in a sealed envelope,
with postage thereon fully paid, in the United States Mail in a deposit box so provided at the
above-named correctional institution in which I am presently confined. The envelope was
addressed as follows:

Jared Frost N.V. Agent 555 East Washington Ave
#3900 Las Vegas NV 89101

I declare under penalty of perjury under the laws of the United States of America that the
forgoing is true and correct.

Executed on 11-1-18
(DATE)

Jesse Ross
(DECLARANT'S SIGNATURE)

Jesse Ross #1095756
HSD-P.O. Box 650
Indian Springs NV.
89070

Man for costs/fees
Ross-r-Sandoun/eta1,
USDC No:
2:17-cv-02386-APG-GWF

1725385

Facsimile

RECEIVED \$003.50



NOV 11 2018

Legal Mail

3762

Clerk
USDC-D.NV
Lloyd D. George U.S. Courthous
333 Las Vegas Blvd. S.O.-Rm 1334
Las Vegas N.V. 89101